

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

Cook County State's Attorney	)	
	)	
Motion For Stay Of Commencement Of	)	
Customer Education And Order	)	ICC Docket No. 01-0066
Requiring NeuStar To Demonstrate That	)	
The 847 NPA Is, In Fact, Exhausted	)	

**REPLY TO THE COOK COUNTY STATE'S ATTORNEY'S OBJECTION TO  
THE RESPONSE OF SOUTHWESTERN BELL MOBILE SYSTEMS, INC. D/B/A  
CINGULAR WIRELESS TO THE COOK COUNTY STATE'S ATTORNEY'S  
MOTION FOR ISSUANCE OF A SUBPOENA DUCES TECUM**

Southwestern Bell Mobile Systems, Inc. d/b/a Cingular Wireless ("Cingular")  
hereby replies to the Cook County State's Attorney's ("Cook County") Objection to  
Cingular's Response to Cook County's Motion for Issuance of a Subpoena Duces Tecum.

1. As stated in Cook County's Objection, Cingular failed to serve Cook County Assistant State's Attorney David L. Heaton via e-mail by 4:30 p.m. on March 7, 2001.
2. As implied in paragraph 7 of Cook County's Objection, Cingular's failure in this regard was completely unintentional and Cingular apologizes for any resulting inconvenience.
3. Cingular has attempted to maintain a current and complete service list for this docket, and in good faith to serve all of Cingular's filings on all interested parties in a timely manner. However, as evidenced by the Hearing Examiners' recent request that all parties file a statement as to whether they wish to remain on the service list, and if so what contact information should be included thereon, this has become a difficult task.

4. On March 7, 2001, Cingular did in fact file its Response to Cook County's Motion via the ICC's e-Docket system, and served the Response via U.S. Mail on the parties at the addresses listed on the most current service list Cingular had available to it on that date, including:

Marie Spicuzza  
Leijuana Doss  
David L. Heaton  
Allan Goldenberg  
Cook County State's Attorney's Office  
Environment & Energy Division  
69 West Washington, Suite 700  
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5. Because the substance of Cingular's Response is consistent with responses to Cook County's Motion filed by other parties to this docket, consideration by the Hearing Examiners of Cingular's Response will not prejudice Cook County or any other party.
6. However, in the event Cook County or any other party requests additional time to file additional replies to anything unique in Cingular's Response, Cingular will not object.

### **CONCLUSION**

For the foregoing reasons, Southwestern Bell Mobile Systems, Inc. d/b/a Cingular Wireless prays that the Hearing Examiners over-rule Cook County's Objection and properly consider Cingular's Response to Cook County's Motion for a Subpoena Duces Tecum.

Dated this 20<sup>th</sup> day of March, 2001

Respectfully submitted,

SOUTHWESTERN BELL MOBILE  
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WIRELESS

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CERTIFICATE OF SERVICE  
Docket No. 01-0066

The undersigned certifies that a copy of the foregoing Reply tto Cook County State's Attorney's Objection to the Response of Southwestern Bell Mobile Systems, Inc., d/b/a Cingular Wireless to the Cook County State's Attorney's Motion for Issuance of a Subpoena Duces Tecum was served upon the following persons by depositing a copy of same for U.S. Mail Delivery with the United States Post Office, properly addressed and with the proper postage affixed thereto this 20<sup>th</sup> day of March, 2001. (\*denotes service by electronic mail also)

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